1	HEATHER E. WILLIAMS, SBN 122664					
2	Federal Defender HOOTAN BAIGMOHAMMADI, SBN 279105					
3	Assistant Federal Defender Designated Counsel for Service 801 I Street, Third Floor Sacramento, CA 95814					
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5	T: (916) 498-5700 F: (916) 498-5710					
6	Attorneys for Defendant					
7	Mr. Garcia					
8	IN THE UNITED STATES DISTRICT COURT					
9	FOR THE EASTERN DISTRICT OF CALIFORNIA					
10	UNITED STATES OF AMERICA,) Case No. 2:23CR228-DJC				
11	Plaintiff,)) STIPULATION AND ORDER TO CONTINUE				
12	vs.) JUDGMENT AND SENTENCING				
13	EDGAR ENRIQUE GARCIA-) Date: March 6, 2025) Time: 9:00 a.m.				
14	LOPEZ,) Judge: Hon. Daniel J. Calabretta				
15	Defendant.					
16	IT IS HEREBY STIPULATED and agreed by and between Acting United States					
17	Attorney Michele Beckwith, through Assistant United States Attorney Alstyn Bennett, counsel					
18	for Plaintiff, and Federal Defender Heather Williams, through Assistant Federal Defender					
19	Hootan Baigmohammadi, counsel for Defendant Edgar Enrique Garcia-Lopez, that the					
20	previously scheduled Judgment and Sentencing set for March 6, 2025 be continued to April 10,					
21	2025 at 9:00 a.m.					
22	The parties specifically stipulate as follows:					
23	1. On January 21, 2025, the Court continued Judgment and Sentencing at Mr.					
24	Garcia's request so that the government could extract data from his seized cellula					
25	phone (the phone was in	the government's possession at the time, but no				
26	extraction had been completed) and allow him to review it for sentencing					
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1	mitigation purposes. Some	of the data on the phone may be relevant to formal					
2	PSR objections.						
3	2. The government did not co	emplete the phone extraction prior to formal objections					
4	being due on February 20,	2025. They expect the extraction to be completed some					
5	time next week.						
6	3. Good cause and compelling	Good cause and compelling circumstances exist to continue the Judgment and					
7	Sentencing so that Mr. Gar	Sentencing so that Mr. Garcia can have an opportunity to review the extraction					
8	prior to timely filing formal PSR objections.						
9	4. The government does not object to Mr. Garcia's continuance request.						
10	5. For the forgoing reasons, the	5. For the forgoing reasons, the parties jointly request that the Judgment and					
11	Sentencing Schedule be mo	odified as follows.					
12							
13	Draft PSR	completed					
14	Informal Objections	completed					
15	Final PSR	completed					
16	Formal Objections	March 27, 2025					
17	Response to Formal Objections/Senter Memorandum	ng April 3, 2025					
18							
19	Judgment and Sentencing	April 10, 2025, at 9:00 AM					
20							
21		D (C11 1 1) 1 1					
22		Respectfully submitted,					
23		HEATHER E. WILLIAMS Federal Defender					
24	Date: February 21, 2025	/s/ Hootan Baigmohammadi					
25		HOOTAN BAIGMOHAMMADI Assistant Federal Defender					
26		Attorneys for Defendant Mr. Garcia					
27							
28		-2- United States v. Garaja					
	Stimulation and Order to Continue Judgment	-L- United States v. Garcia					

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1	Date: February 21, 2025	MI	CHELE BECKWIT	TH
2	Dute. 1 cordary 21, 2023		ting United States A	
3		<u>/s/</u>	Alstyn Bennett	
		AL	STYN BENNETT sistant United States	s Attorney
5		Att	corneys for Plaintiff	5 1 1.1.10 1.1.0 y
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The Court, having received and considered the parties' stipulation appearing therefrom, adopts the parties' stipulation in its entirety as its of the parties'	order.
The Court, having received and considered the parties' stipulation appearing therefrom, adopts the parties' stipulation in its entirety as its of the parties'	order.
appearing therefrom, adopts the parties' stipulation in its entirety as its of IT IS SO ORDERED. Dated: February 24, 2025 Dated: February 24, 2025 /s/ Daniel J. Calabretta THE HONORABLE DA UNITED STATES DIST UNITED STATES DIST 11 12 13 14 15 16 17 18 19	order.
IT IS SO ORDERED. Dated: February 24, 2025 S Daniel J. Calabretta	
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28 Stimulation and Order to Continue Judgment -4-	